

Lori Rifkin, SBN 244081
RIFKIN LAW OFFICE
3630 High St. #18917
Oakland, CA 94619
Telephone: (510) 414-4132
Email: rifkin@rifkinlawoffice.com
Attorney for Plaintiffs

Leslie J. Girard, SBN 098986
County Counsel
Janet L. Holmes, SBN 107639
Assistant County Counsel
Ellen S. Lyons, SBN 136011
Deputy County Counsel
County of Monterey
168 West Alisal Street, Third Floor
Salinas, California 93901-2653
Telephone: (831) 755-5045
Facsimile: (831) 755-5283
Email: HolmesJL@co.monterey.ca.us
LyonsE@co.monterey.ca.us
Attorneys for COUNTY OF MONTEREY Defendants

Peter G. Bertling, SBN 131602
Jemma Parker Saunders, SBN 227962
Bertling Law Group, Inc.
21 East Canon Perdido Street, Suite 204B
Santa Barbara, CA 93101
Telephone: 805-879-7558
Facsimile: 805-869-1597
Email: peter@berplinglawgroup.com
jemma@berplinglawgroup.com
Attorneys for WELLPATH Defendants

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

ESTATE OF RAFAEL RAMIREZ LARA, deceased,
by and through PATRICIA RAMIREZ; PATRICIA
RAMIREZ; RAFAEL RAMIREZ; and JENNIFER
RAMIREZ.

Plaintiffs,

V.

COUNTY OF MONTEREY; SHERIFF STEVE BERNAL, in his individual and official capacity; JAMES BASS, in his individual and official capacity; JOHNATHAN THORNBURG, in his individual and official capacity; RAY TONGOL, in his individual and official capacity; J. TEJEDA; WELLPATH; KIP HALLMAN; JORGE DOMINICIS; THOMAS PANGBURN; PAUL FRANCISCO; RAYMOND HERR and CHRISTINA KAUPP,

Defendants.

Case No.: 4:21-cv-02409-PJH

**JOINT NOTICE OF SETTLEMENT;
[PROPOSED] ORDER**

Trial Date: February 27, 2023

TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs ESTATE OF RAFAEL RAMIREZ LARA, deceased, by and through PATRICIA RAMIREZ; PATRICIA RAMIREZ; RAFAEL RAMIREZ; and JENNIFER RAMIREZ, and Defendants COUNTY OF MONTEREY; SHERIFF STEVE BERNAL, in his individual and official capacities; JAMES BASS, in his individual and official capacity; JOHNATHAN THORNBURG, in his individual and official capacity; RAY TONGOL, in his individual and official capacity; and J. TEJEDA, (collectively “County of Monterey Defendants”); and Defendants WELLPATH; KIP HALLMAN; JORGE DOMINICIS; THOMAS PANGBURN; PAUL FRANCISCO, RAYMOND HERR, and CHRISTINA KAUPP (collectively, “Wellpath Defendants”), have agreed to a settlement of this matter. The Parties are in the process of executing written settlement agreements. For this reason, the Parties request that all trial and pretrial dates and related deadlines be taken off calendar, with the Parties to execute final settlement agreements within 30 days of today, and Plaintiffs to file a notice of dismissal of the action within 60 days. The Parties request that, upon dismissal, the Court retain jurisdiction to enforce the settlement agreement reached in this matter.

Respectfully Submitted,

Dated: September 30, 2022

RIFKIN LAW OFFICE

By: /s/ Lori Rifkin
Lori Rifkin
Attorney for Plaintiff

Dated: September 30, 2022

COUNTY OF MONTEREY COUNTY COUNSEL

By: /s/ Ellen S. Lyons
Janet L. Holmes, Assistant County Counsel
Ellen S. Lyons, Deputy County Counsel
Attorneys for COUNTY OF MONTEREY
Defendants

Dated: September 30, 2022

BERTLING LAW GROUP

By: /s/ Jemma Parker Saunders
Peter G. Bertling
Jemma Parker Saunders
Attorneys for WELLPATH

[PROPOSED] ORDER

The Court, having considered the Parties' above joint notice and good cause appearing,
ORDERS as follows:

All trial and pretrial dates and deadlines are taken off calendar with the Parties to execute final settlement agreements within 30 days, and Plaintiffs to file a notice of dismissal of the action within 60 days. The Court shall retain jurisdiction to enforce the settlement agreed to by the Parties in this matter.

IT IS SO ORDERED.

Dated: _____, 2022.

PHYLLIS J. HAMILTON
United States District Judge